

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

**1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270**

March 9, 2023

SPECIAL NOTICE AND DEMAND LETTER
URGENT LEGAL MATTER, PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED #7020 0640 0000 9754 0248

Indorama Ventures Oxides, LLC
c/o Corporation Service Company dba CSC - Lawyers Incorporating Service Company
211 E. 7th Street, Suite 620
Austin, Texas, 78701-3218

Re: Special Notice of Potential Liability and Draft Consent Decree
Star Lake Canal Superfund Site located in and around the cities of Port Neches and Groves,
Jefferson County, Texas
SSID No. 06GY, EPA ID No. TX0001414341

Dear Sir or Madam:

This letter is to notify Indorama Ventures Oxides LLC, (hereinafter Indorama, you or your) of its potential liability under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and invite you to enter into negotiations with the U.S. Environmental Protection Agency (EPA) to resolve your responsibility for the cleanup of the Star Lake Canal Superfund Site (Site) located in and around the cities of Port Neches and Groves, Jefferson County, Texas. Based on available information, the EPA has determined that due to hazardous substances originating from property you either own and/or operated in Jefferson County, Texas, such hazardous substances may have been released into the Jefferson and/or Star Lake Canals and/or the Molasses Bayou Wetland and/or the Molasses Bayou Waterway in Jefferson County, Texas. The Molasses Bayou Wetland and the Molasses Bayou Waterway are two of the seven areas of interest ("AOI") at the Site. The other five AOI's are Gulf States Utility Canal, Star Lake Canal, Former Star Lake, Jefferson Canal Spoil Pile and Jefferson Canal (Enclosure 1).

Therefore, the EPA has determined that Indorama is a potentially responsible party (PRP) within the meaning of Section 107(a)(3) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund), 42 U.S.C. § 9607(a)(3). Under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), parties who have arranged for disposal of hazardous substances at Superfund sites are liable for the cleanup of the Site, including all costs incurred by the EPA in responding to releases at the Site.

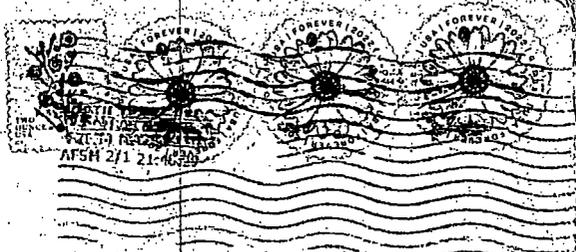
Under the federal Superfund law, you and the other PRP at the Site are responsible for the costs of cleaning up the Site. The decision by the EPA on the cleanup approach to be implemented at the Site is embodied in a final Record of Decision (ROD), executed on September 30, 2013 (Enclosure 2). In addition, the Star Lake Canal Cooperating Parties Group ("Group") is currently performing a Remedial Design at the Site pursuant to the enclosed Settlement Agreement and Administrative Order on Consent for Remedial Design (AOC) which include the Statement of Work (SOW) issued on September 26, 2016 (Enclosures 3 & 4).

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U.S. EPA Region 6
Ken Talton, Enforcement Officer
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Dallas, Texas 75270-2102



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